

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

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SUBJECT: SCP-Carlstadt Remedial Investigation

FROM: Janet Feldstein  
Environmental Engineer

TO: File

On December 29, 1986, a conference call was held to discuss the planned Remedial Investigation at the SCP- Carlstadt site. The SCP-Carlstadt Steering Committee requested this discussion. The following seven people participated in the telephone call:

Ray Basso: EPA  
Janet Feldstein: EPA

PRP Representatives:

Bill Friedman: Pitney, Hardin, et al  
Lou Destefano: Carpenter Bennet, Morrissey  
Bill Ward: General Motors Corp.  
Jack Koczan: Dames & Moore  
Jerry Coscia: Dames & Moore

The PRP representatives stated that they wanted to discuss EPA's additional comments on the Draft Project Operations Plan, sent to the PRPs on November 26, 1986. In general, the PRPs were concerned that there had been a substantial increase in their contractor's estimated cost for the Remedial Investigation, and felt that some of the work recommended by EPA was unnecessary at the present time.

We began by discussing the stream sampling locations and events. EPA had recommended adding one sampling point, bringing the total to four samples per event (two events then bring the total number of water samples to eight), and adding a deeper sediment sample at each of the four locations, bringing the total to eight samples per event (two events then bring the total number of sediment samples to sixteen.)

The PRPs felt that the increase in the number of sediment samples was unjustified (from three to sixteen). After discussing this issue, EPA agreed to permit the PRPs to take only one round of sediment samples, but that samples must still be taken at the four locations and at two depths. We decided that the two depths should be changed from 0-2" and 6-12" to 0-6" and 12-18". The PRPs agreed that the latter depths would present a clearer picture of the site's impact on the stream sediments. Thus, EPA's final recommendation was that four sampling stations be set up; water samples should be collected at each location, at two separate times, and sediment samples should be collected at two depths at each location, one time.

The PRPs then expressed concern about the fourth sampling station, to be set up at Peach Island Creek's confluence with Berry's Creek.

Bill Ward said that he felt that the fourth sampling Station might produce misleading data, and that "no data" might be better than "incomplete data". He said he was concerned that EPA might base a remedial decision on only two samples from this station. Ray Basso and I tried to reassure him that although EPA feels it is necessary to determine the site's impact downstream, we realize that two samples collected at this location may not be enough to determine the exact magnitude of contamination; if some contamination is detected, further investigations will have to be made.

Finally, we discussed the additional surficial soil samples to be collected at each of the seventeen soil sampling stations. The PRPs argued that the collection and analysis of these seventeen additional samples would result in a substantial increase in the cost of the Remedial Investigation. EPA reiterated its position (reflected in the November 26, 1986 letter to Tom Armstrong) that in order to properly characterize the site, soil samples must be taken at 3 depths (0-1 ft., 2-3 ft., and 4-5 ft.) at each of the seventeen locations. The PRPs proposed sampling at 0-1 ft. and 4-5 ft., and then, if necessary, going back to sample at 2-3 ft. only for certain "target" parameters. They felt that this would save them a lot of money on analytical costs. Ray Basso and I explained that this approach would only add time to the Remedial Investigation, and was not likely to reduce costs, since they might need special analytical services (i.e., turnaround time) in order to make the necessary decisions.

EPA made it clear that the initial investigation must include the soil sampling program outlined in the November 26, 1986 letter AND the stream/sediment sampling program outlined during this December 29, 1986 telephone conversation. The PRPs said they needed to discuss these issues with the remainder of the Technical Committee, and possibly, with the whole group of PRPs contributing to the study. They said they would get back to us by December 31, 1986. We reiterated our position and told the PRP representatives not to come back with a counterproposal, and said that EPA had laid out the minimum work which is acceptable for the initial sampling effort.

On December 31, 1986, Ray Basso and I spoke with Bill Friedman. Bill said that Bill Ward was going to meet with the Technical Committee on Wednesday, January 7, 1987, and they would have a reaction for us on Wednesday afternoon. He also said it was likely that the Committee would have to send out a letter to all the PRPs, requesting approval of the additional work. We asked

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for a letter explaining the delay in initiation of field work, and stressed the need for these matters to be resolved expeditiously. We also suggested that while the Committee is attempting to reach a decision on these matters, Dames & Moore should be working on the response to the other comments in the November 26, 1986 letter; this will enable Dames & Moore to commence field work immediately upon resolution of the stream/sediment soil sampling issues.

cc: John V. Czapor, SCB  
Ray Basso, SCB  
Jim Rooney, ORC